

**Code 6b Draft general permits**

**Failure to assess the impacts of proposed general permits**

Commenter (0386) considers the proposal flawed in several respects and pointed out the failure to assess the impacts of proposed general permits and provide the analyses for public review. The commenter quoted federal regulation language that “[t]he Director may issue a general permit for categories of similar activities if he determines that the regulated activities will cause only minimal adverse environmental effects when performed separately and will have only minimal cumulative adverse effects on the environment” 40 CFR 233.21(b). The commenter stated that FDEP seems to believe that it can use language from general permits developed by the Corps at a national level without any process to adapt them to state use, without providing evidence of analysis to support this decision.